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5 Attorney for Plaintiff GUADALUPE ORTIZ

6 UNITED STATES DISTRICT COURT
7 DISTRICT OF NEVADA

8 GUADALUPE ORTIZ,

9 Plaintiff,

10 vs.

11 ALS USA INC., a Nevada Corporation.

12 Defendant.

)
) Case No.: 3:21-cv-00335-MMD-WGC

) **STIPULATION AND ORDER TO**
) **EXTEND TIME TO SUBMIT DISMISSAL**
) **PAPERS AFTER RESOLUTION**

) [FIRST REQUEST]
)

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14 On March 22, 2022 the Parties met at the Early Neutral Evaluation and reached an
15 agreement to resolve the case. The court ordered that the parties submit dismissal paperwork by
16 May 6, 2022. The Parties request that this date be extended through and including **May 31, 2022**.
17 The reason is that Plaintiff's counsel has had personal issues with a death in his family in early
18 April and a number of personal obligations and a heavy work schedule that has prevented him
19 from finalizing the agreement which was drafted by Defense counsel and provided in April.
20 Plaintiff's counsel will be addressing this forthwith. However, it is expected that some time will
21 be needed to complete the terms of the agreement and submit the dismissal paperwork.
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1 For the foregoing reasons the parties respectfully request that this stipulation for an
2 extension of time to complete the dismissal paperwork and submit it to the court be granted and a
3 new deadline of May 31, 2022 be ordered.

4 /s/ James P. Kemp

5 James P. Kemp, Esq.

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10 Attorney for Plaintiff

11 Guadalupe Ortiz

/s/ Rebecca Bruch, Esq.

Rebecca Bruch, Esq.

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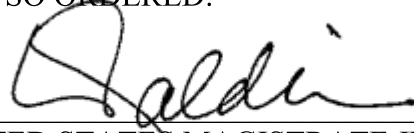
Reno, Nevada 89519

(775) 786-6868 / 786-9716 fax

Attorney for Defendant

ALS USA, Inc.

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13 IT IS SO ORDERED:

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15 UNITED STATES MAGISTRATE JUDGE

16 Dated: May 16, 2022